

BLEAKLEY PLATT

NEW YORK CONNECTICUT

MATTHEW G. PARISI
914.287.6184
MPARISI@BPSLAW.COM

BLEAKLEY PLATT & SCHMIDT, LLP

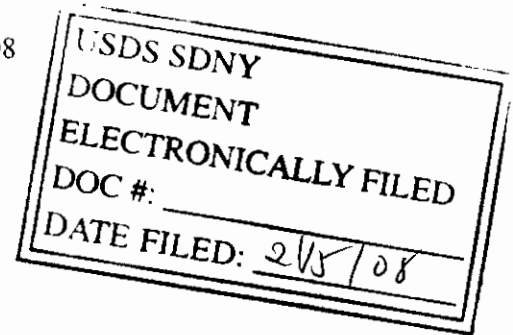
ONE NORTH LEXINGTON AVENUE
WHITE PLAINS, NEW YORK 10601
914.949.2700
FAX: 914.683.6956
BPSLAW.COM

February 13, 2008

VIA EMAIL

Eileen_Levine@NYSD.uscourts.gov

Hon. Richard J. Sullivan
United States District Court
Southern District of New York
500 Pearl Street, Room 920
New York, New York 10007



**Re: General Capital Partners v. Liberty Ridge, LLC
v. Liberty Heritage Associates, Inc.
1:07-CV-4089 (RJS)
Request for Adjournment of Certain Scheduling Order Dates**

Dear Judge Sullivan:

I represent defendant/third party plaintiff Liberty Ridge, LLC ("Liberty Ridge") in the above referenced matter. I write to request, on behalf of all parties, an adjournment of the dates in the Case Management and Scheduling Order in this matter. Rather than wait until the upcoming March 5 conference, the parties believe it advisable to request the adjournments at this time. There have been no prior requests for adjournment.

The Scheduling Order was filed and entered on October 23, 2007. At that time, Liberty Ridge was contemplating, but had not yet commenced, a third party action. On November 1, Liberty Ridge filed suit against third party defendant Liberty Heritage Associates, Inc. ("LHA"). LHA answered on December 5. Since that time, initial discovery demands and initial disclosures have been exchanged by all parties. In addition, although scheduling was difficult due to conflicting schedules among the parties and counsel, a settlement conference is now scheduled for February 20, 2008 before the Hon. Douglas F. Eaton. All parties have agreed that the settlement conference should proceed before we engage in the exchange of additional documents and conduct depositions of the parties. However, we recognize that, should settlement not be reached, there will be a need to conduct discovery on an expedited basis.

Hon. Richard J. Sullivan
February 11, 2008
Page 2

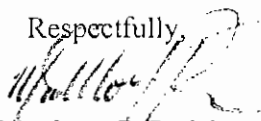
Accordingly, I hereby request that the dates in the October 27, 2008 Scheduling Order be adjourned for 60 days. The remaining deadlines would be as follows:

6.	All fact discovery completed:	April 15
7(c).	Depositions to be completed:	April 15
7(d).	Requests to Admit served:	March 3
8(a).	Plaintiffs' Expert Disclosures:	February 25 (70 day extension)
8(b).	Defendants' Expert Disclosures:	March 15
9.	Pre-Motion Letter Deadline:	Three weeks before Pre-Trial Conference

All other dates, and presumably the March 5 conference date, would remain the same. Attached is a proposed amended scheduling order.

Thank you for your consideration.

Respectfully,




Matthew G. Parisi

cc: A. Peter Brodell, Esq. (*via email*)
Christopher Giamo, Esq. (*via email*)
John Leonard, Esq. (*via email*)

SO ORDERED
Date

2/14/08



RICHARD J. SULLIVAN
U.S.D.J.